

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

In re: Petition of Boston Edison Company,)	
Cambridge Electric Light Company and)	
Commonwealth Electric Company d/b/a/ NSTAR)	
Electric, pursuant to G.L. c. 164, § 94 and 220)	D.T.E. 03-100
C.M.R. §§ 5.00 <u>et seq.</u> , for approval by the)	
Department of Telecommunications and Energy of)	
a new renewable power supply offering.)	

FIRST SET OF JOINT INFORMATION REQUESTS OF
THE CAPE LIGHT COMPACT AND MASSACHUSETTS
ENERGY CONSUMERS
ALLIANCE, INC.

Pursuant to 220 C.M.R. 1.06(6)(c), the Cape Light Compact (the “Compact” or “CLC”) and Massachusetts Energy Consumers Alliance, Inc. (“MEC”) hereby submit to Boston Edison Company the following information requests with respect to the above-captioned matter.

INSTRUCTIONS

The following instructions apply to this set of information requests and all subsequent information requests issued by the Compact in this proceeding.

1. “NSTAR Electric” or “Company” means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, its officers, directors, employees, consultants, and attorneys.
2. “Company Filing” or “Filing” means all the documents NSTAR Electric filed in this proceeding.
3. “Filing Letter” refers to the letter from counsel for NSTAR Electric, Robert N. Werlin, Esq., pursuant to 220 C.M.R. § 5.03, that explained the proposed tariff entitled, “NSTAR Green Power Adjustment,” M.D.T.E. No. 110, filed on October 16, 2003.
4. “NSTAR Green” means the tariff, NSTAR Green Power Adjustment, M.D.T.E. No. 110, filed with the Department of Telecommunications and Energy (“DTE” or the “Department”) on October 16, 2003.

5. "Identify a document" or equivalent language means to state with respect thereto:
 - a. The identity of the person who prepared it;
 - b. The identity of the person who signed it or over whose name it was issued;
 - c. The identity of each person to whom it was addressed or distributed;
 - d. The nature or substance of the document with sufficient particularity to enable it to be identified;
 - e. The date and, if it bears no date, the date when it was prepared; and
 - f. The physical location of it and the name and address of its custodian or custodians.
6. "Identify a person" or equivalent language means to state his/her name, last known business and/or home address, phone number and, if employed, his/her job title or position and the name and address of his/her employer.
7. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
8. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
9. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
11. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
12. If the Company finds that any of these requests is ambiguous, please notify the Compact's attorney Jeffrey M. Bernstein, so that the requests can be clarified prior to the preparation of a written response.

13. Please serve a copy of the responses on the Compact's attorney, Jeffrey M. Bernstein and the service list in this proceeding.

INFORMATION REQUESTS

CLC/MEC 1-1

The Company notes in its Filing Letter at 1, that it conducted research into residential customers' interest in "green" electricity.

- A. How many residential customers did the Company survey or otherwise contact or communicate with?
- B. Did the Company present those residential customers with a description of the NSTAR Green program similar to the one proposed in the Filing?
- C. How many focus groups did the Company convene and what was the composition of each focus group?
- D. Did the Company present focus groups with a description of the NSTAR Green program similar to the one proposed in the Filing?
- E. Please provide all documents referred to in or pertaining to your response to subparts A – D, above, including, without limitation, any documents or other materials provided to or used in conjunction with any focus groups or other discussions with residential customers.

CLC/MEC 1-2

The Company notes in its Filing Letter at 2, that its proposed 25 percent incremental green offering represented a balance struck from the results of research completed with its focus groups.

- A. What were the different green generating sources and/or percentage offerings presented to the customers surveyed and what were the customer reactions to each?
- B. What were the various estimates of price increases (resulting from increased green supplies) presented to the customers surveyed and what were the customer reactions to each?
- C. Please provide all documents referred to in or pertaining to your response to subparts A – B, above, including, without limitation, any documents or other materials provided to or used in conjunction with any focus groups or other discussions with residential customers.

CLC/MEC 1-3

- A. Please provide all documents pertaining to or referring to the development of the NSTAR Green Proposal, including, without limitation, earlier (pre-filing) versions of such proposal and internal Company memoranda suggesting the development of such a product.
- B. Please identify all NSTAR personnel who had a material role in the evaluation and preparation of the NSTAR Green Proposal and explain their role(s).

CLC/MEC 1-4

With regard to the Company's reports of customer migration data to the Division of Energy Resources, please describe which rate classes are included in each of the following categories:

- a. small commercial and industrial,
- b. medium commercial and industrial, and
- c. large commercial and industrial.

Please answer separately for Boston Edison, Commonwealth Electric, and Cambridge Electric.

CLC/MEC 1-5

The Company notes in its Filing Letter at 3 (footnote 5) that it may in the future, propose recovery of "incremental costs" from its NSTAR Green customers. Please describe in detail any research or analysis completed regarding cost of service for NSTAR Green, specifically related to the following factors:

- a. administrative costs,
- b. procurement,
- c. contracting,
- d. staffing,
- e. regulatory compliance, third-party auditing costs (i.e. by Green-e or the equivalent to ensure program credibility), and
- f. marketing costs.

CLC/MEC 1-6

Please provide all documents pertaining to or referred to in preparing your answer to CLC/MEC 1-5 above.

CLC/MEC 1-7

If NSTAR Green customers will not be paying for the incremental costs referred to in CLC/MEC 1-5, will the Company's shareholders pay these costs, or will non-participating Company customers be asked to pay these costs? Please provide a detailed response and identify the customer classes and/or rate components

(e.g. Standard Offer, Default Service, Distribution) to which such costs will or may be assigned.

CLC/MEC 1-8

- A. Please explain how NSTAR developed the procurement process it has utilized thus far in relation to the NSTAR Green Proposal. Identify any documents or persons that NSTAR consulted or referred to in connection with the development of that process and provide a copy of all such documents.
- B. Has NSTAR modified the form of Purchase Agreement included in the Filing? If so, please describe any such modifications and provide a copy of all documents containing or pertaining to such changes.

CLC/MEC 1-9

- A. Has NSTAR purchased enough or entered into contracts for enough RPS-eligible certificates to comply with the RPS in 2004?
- B. How many certificates for 2003 and 2004 RPS has NSTAR purchased? Please provide a detailed response and identify the source of such certificates (i.e. by project and type).
- C. Please provide all documents pertaining to or referred to in preparing your answer to subparts A and B, above.

CLC/MEC 1-10

- A. Has NSTAR done an analysis of whether NSTAR Green will affect its ability to comply with the RPS in 2004?
- B. If so, please provide all documents containing or pertaining to such analysis.

CLC/MEC 1-11

- A. Has NSTAR done an analysis of how NSTAR Green would affect the market price of RPS-eligible certificates, at various levels of market penetration?
- B. If so, please provide all documents containing or pertaining to such analysis.

CLC/MEC 1-12

- A. Given that NSTAR is expected to be a load-serving entity for some number of years (i.e. many more than the two referenced as the marketing window) and that the load could be substantial, did NSTAR give any consideration to purchasing certificates on a multi-year basis, perhaps in order to procure certificates at a lower average cost and/or to provide support to new renewable energy projects? Please explain your answer in detail.
- B. If so, please provide all documents containing or pertaining to such consideration as referred to in subpart a), above.

CLC/MEC 1-13

Please explain how NSTAR developed Attachment A (Form of Agreement for the Purchase and Sale of Massachusetts New Renewable Energy Certificates). Identify any documents or persons that NSTAR consulted or referred to in connection with the development of that attachment and provide a copy of all such documents.

CLC/MEC 1-14

- A. In developing the Company Filing, what consideration did NSTAR give to the impact of offering the NSTAR Green Proposal on the Compact?
- B. What did NSTAR conclude, if it considered this impact?
- C. Please provide all documents pertaining to or referred to in your answer.

CLC/MEC 1-15

- A. In developing the Company Filing, what consideration did NSTAR give to the impact of offering the NSTAR Green Proposal on competitive suppliers already providing green certificate products in the Massachusetts market?
- B. What did NSTAR conclude, if it considered this impact?

- C. Please provide all documents pertaining to or referred to in your answer to A and B, above.

CLC/MEC 1-16 NSTAR refers to a two-year marketing window before reaching saturation. Filing at 3. How does NSTAR define saturation?

CLC/MEC 1-17

- A. If penetration is 1%, 2%, 3%, 4%, or 5% how would NSTAR meet demand?
- B. Will it have enough certificates to meet the stated objective of 25% new, and 5% wind and solar? Or, will NSTAR cut back on marketing and/or run a waiting list?

CLC/MEC 1-18 What evidence does NSTAR have to suggest that there exists enough wind and solar to meet the 5% stated objective? Please identify all potential resources, noting that 03-100 referenced Massachusetts RPS-eligible resources.

CLC/MEC 1-19 Please provide a copy of all marketing materials, including, without limitation, copy for the NSTAR website, used for the NSTAR Green Proposal thus far.

CLC/MEC 1-20 What marketing activities will NSTAR undertake? At what cost? Please describe these activities in detail and provide any documents supporting or referred to in the Company's response.

CLC/MEC 1-21 Why did NSTAR reject adoption of the Green-e standard?

CLC/MEC 1-22 Please provide all documents referred to or pertaining to NSTAR's comments in reply to the Joint Comments of the Compact and MEC (filed on December 11, 2003) to the extent NSTAR objected to or materially disagreed with the points made by the Compact and MEC in their Joint Comments.